

Fact Sheet



*For Final Administrative Amendment Permitting Action Under 45CSR30
and
Title V of the Clean Air Act*

Permit Number: **R30-09900009-2012**

Application Received: **February 5, 2016**

Plant Identification Number: **03-54-09900009**

Permittee: **Ashland Inc.**

Facility Name: **Ashland Performance Materials / Neal Plant**

Mailing Address: **100 Big Sandy River Road, Kenova, WV 25530**

Permit Action Number: **AA01** Revised: *April 6, 2016*

Physical Location:	Neal, Wayne County, West Virginia
UTM Coordinates:	360.8 km Easting • 4,247.7 km Northing • Zone 17
Directions:	On the west side of Big Sandy River Road, 0.9 miles south of the junction of Big Sandy River Road with Interstate 64.

Facility Description

Maleic anhydride is produced by catalytic partial oxidation of n-butane. This is accomplished by passing a gas mixture consisting of atmospheric air (approximately 98%) and commercial grade butane (approximately 2 percent) over a proprietary vanadium phosphate catalyst.

SIC:

2865 Chemicals-Allied Products, Cyclic Crudes-Intermediates

Operating scenarios:

- (1) Normal operation of facility with thermal oxidizer as the primary control device.
- (2) Operation without thermal oxidizer and emissions to the abatement scrubber. This scenario addresses plant operations in the event the primary control device (thermal oxidizer) is off-line due to maintenance activities or malfunction. When the incinerator is not operational, air emissions

from the reactors would include CO and VOCs. The VOC stream consists primarily of methane, ethane, propane, butane, and acrylic acid. The vent stream from the batch refiner would also be directed to the abatement scrubber. This stream consists primarily of xylene.

The company requested this revision to include requirements of recently issued temporary permit R13-3297T in order to continue their ability to use 40 Portable Diesel Fuel Fired Air Compressors, 76.3 HP each (Emission Units IDs 008-01 through 008-40, Emission Points IDs 17E through 56E), as primary supply of compressed air, a raw material in the production of maleic anhydride, in the event that one of the two existing electric air compressors experiences extended downtime for maintenance or repairs. These 40 compressors are limited to 2,250 hours of operation each, or a total maximum of 90,000 operating hours for a maximum of 40 portable air compressors. These 40 portable air compressors were already included in the Title V permit during minor modification MM01 approved on October 28, 2014. However, the temporary permit R13-3182T they were approved under has expired.

Emissions Summary

There are no emission changes as the result of this administrative amendment.

Title V Program Applicability Basis

With the proposed changes associated with this administrative amendment, this facility maintains the potential to emit 617.7 TPY of CO. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Ashland Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This administrative amendment has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction Permit
State Only:	none	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-3297T	March 10, 2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes to the Title V Permit are based on recently issued temporary permit R13-3297T and consist of the following:

- 1) Old temporary permit number "R13-3182T" was replaced with the new temporary permit number "R13-3297T".
- 2) Emission Units Table 1.1 - installation date of the 40 Portable Diesel Fuel Fired Air Compressors was changed to 2016.
- 3) Requirement 3.4.1 - a citation was added to include R13-3297T requirement 4.4.1.
- 4) Requirement 6.1.5 – effective date of the temporary permit was changed to March 10, 2016.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40CFR63 Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*. Per 40 CFR §1068.30 portable engines are considered "nonroad engines" (*Nonroad engine*, (1)(iii)), and per §63.6585(a) they are not subject to this subpart as long as they do not stay at the site for more than 12 consecutive months (*Nonroad engine*, (2)(iii)).
2. Requirements 4.1.6, 4.4.2 and 4.4.3 of the permit R13-3297T were left out of this permit because there are no control devices associated with the Portable Diesel Fuel Fired Air Compressors.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.